September 15, 2020

Mayor Jesse Arreguín, President
ABAG Executive Board, Association of Bay Area Governments
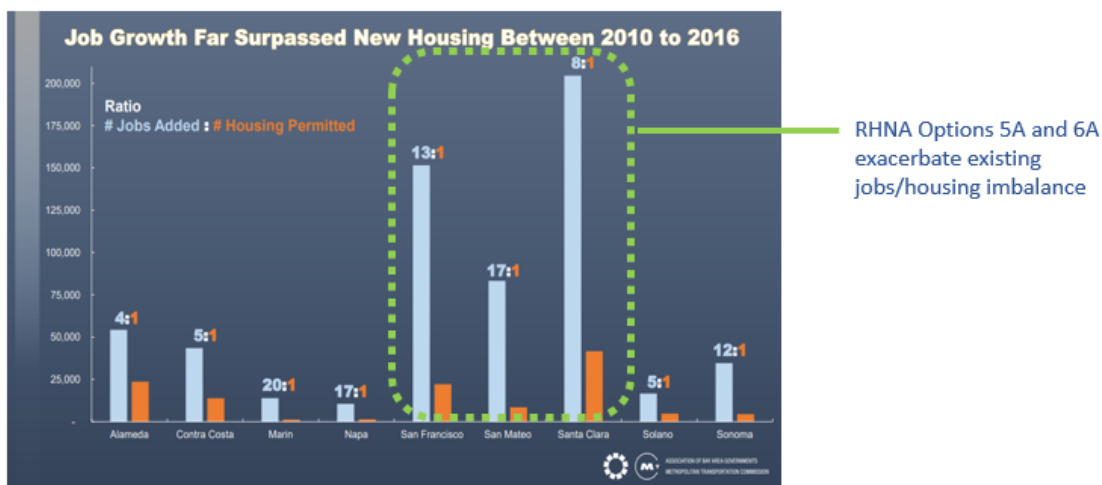375 Beale Street, Suite 700
San Francisco, CA  94105-2066

Dear President Arreguín:

Our council wishes to convey our tremendous appreciation for the Housing Methodology Committee's (HMC) work on the formidable task of evaluating housing allocation methodologies for the next Regional Housing Needs Allocation (RHNA) cycle (2023-2031).  We appreciate the HMC's consideration of our input to date and utilizing the "Plan Bay Area 2050" as the baseline data methodology.

We understand that the HMC is now considering options (a combination of different "factors") that would refine the housing allocation methodology.  To this end, we are writing to express grave concern that the options proposed for consideration - **Option 5A** ("High Opportunity Areas & Jobs") and **Option 6A** ("Modified High Opportunity Areas Emphasis") - are **rife with unintended consequences.**  Specifically:

1.  These methodologies allocate housing growth to "high opportunity areas" (suburban communities) rather than to urbanized city centers with a wealth of transit options and high-quality jobs.  Doing so would **exacerbate the jobs/housing imbalance**:

    Figure 1.  Existing Jobs/Housing Imbalance (source: ABAG)

    in



**5 1 0   L A   G O N D A   W A Y ,   D A N V I L L E ,   C A L I F O R N I A   9 4 5 2 6**

| Administration | Building | Engineering & Planning | Transportation | Maintenance | Police | Parks and Recreation |
|---|---|---|---|---|---|---|
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2. Allocating housing growth to suburban communities **ignores market demand** for housing in urbanized city centers with high-quality jobs.  If the collective goal is to facilitate housing construction, then we strongly advocate for housing to be allocated where there is market demand.

3. Allocating housing growth to small communities with limited land capacity or "high opportunity areas" **ignores land economics**.  Legislating up-zoning to accommodate multi-family housing simply drives up the value of land, which in turn drives up the cost of housing construction.

4. Allocating housing growth in communities that interface with urban growth boundaries would be *contrary* to the prioritizing in-fill development, avoiding areas with natural hazards, and **promotes urban sprawl**.

5. Lastly, allocating growth farther from quality job centers and **exacerbates the staggering commutes on workers**, placing an undue burden on working families.
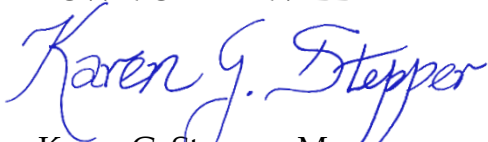
In summary, Danville recognizes the critical need to address a statewide housing affordability crisis and the responsibility of local cities to help address this issue that is critical to the quality of life for all residents.  We believe in – and urge the Executive Board to consider - factors that:

a. **Allocate housing growth near job centers** (i.e., achieve a greater balance between the "jobs" and "housing" bars in the graphic on page 1).  This reduces long commutes and allows development of a strong social/community fabric.

b. **Discourage housing growth near green fields and protected open space**, reducing development pressure at the urban growth boundaries.

c. **Discourage housing growth in small and rural communities** with limited land capacity, to avoid driving up land development costs and building near natural hazards.

With tremendous appreciation for your work, we thank you for your consideration.

Sincerely,
TOWN OF DANVILLE

Karen G. Stepper, Mayor


Attachment A:   Danville Resolution No. 63-2020, supporting the Contra Costa County Mayors Conference endorsement of the 'Plan Bay Area 2050' Methodology as the basis for the 2022-2030 Regional Housing Needs Allocation (RHNA) under review by the Association of Bay Area Governments

RESOLUTION NO. 63-2020

SUPPORTING THE CONTRA COSTA COUNTY MAYORS' CONFERENCE
ENDORSEMENT OF THE 'PLAN BAY AREA 2050' HOUSING ALLOCATION
METHODOLOGY AS THE BASIS FOR THE 2022-2030 REGIONAL HOUSING
NEEDS ALLOCATION (RHNA) UNDER REVIEW BY THE
ASSOCIATION OF BAY AREA GOVERNMENTS

**WHEREAS**, the Contra Costa County jurisdictions' recognize and respect the local needs and character of each community, and have a shared interest in maintaining local control of decision-making related to all aspects of the management of each jurisdiction, including but not limited to financial, land use and development, and growth-related matters; and

**WHEREAS**, in June 2020, the California Department of Housing and Community Development (HCD) determined that the San Francisco Bay region must plan to accommodate 441,176 housing units over the upcoming 8-year housing element cycle (2022-2030); and

**WHEREAS**, according to Association of Bay Area Governments (ABAG), this represents a 135% increase from the previous housing element assignment; and

**WHEREAS**, ABAG has formed a Housing Methodology Committee (HMC) that is charged with evaluating and making a recommendation on how these housing units would be allocated to the Bay Area's 101 cities and 9 counties; and

**WHEREAS**, at a very high level, the HMC is considering a variety of options and factors for allocating housing units; and

**WHEREAS**, selecting a 'baseline data' methodology has the greatest impact on Contra Costa communities and ensuring that there is a match between housing assignments and job centers; and

**WHEREAS**, the Contra Costa Mayors' Conference at their August 6, 2020 meeting discussed and unanimously supported the 'Plan Bay Area 2050 Baseline Data Methodology'; and

**WHEREAS**, the Contra Costa Mayors' Conference sent a letter of support for the 'Plan Bay Area 2050 Baseline Data Methodology' on August 7, 2020; now, therefore, be it

**RESOLVED**, that the Town Council re-affirm the Contra Costa Mayors' Conference letter of support for the support for the 'Plan Bay Area 2050 Baseline Data Methodology' which is consistent with decades-long region-wide efforts to:

- Encourage housing development proximate to job centers, which would in turn
- Reduce transit and transportation congestion, helping to alleviate long regionwide commute times; and
- Reduce greenhouse gas emissions, consistent with AB 32, SB 375 and the Metropolitan Transportation Commission's (MTC) Plan Bay Area 2050 policy framework.

**APPROVED** by the Danville Town Council at a regular meeting on September 1, 2020 by the following vote:

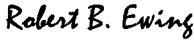**AYES:** Arnerich, Blackwell, Morgan, Stepper, Storer
**NOES:** None
**ABSTAINED:** None
**ABSENT:** None

DocuSigned by:

*Ken Blackwell*

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**MAYOR**

**APPROVED AS TO FORM:**

DocuSigned by:

*Robert B. Ewing*

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**CITY ATTORNEY**

**ATTEST:**

DocuSigned by:

*M Sunseri*

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**CITY CLERK**